CDH Comments on the Proposed
Interim Measure/Interim Remedial Action Decision Document for
the Solar Evaporation Ponds Operable Unit 4.

Section 2.6.1 Pathway Exposure Assessment page 2-25.
Two additional exposure pathways which were not covered are catastrophic failure of one surge tank leading the failure of all three tanks and release of the contaminants in the sediments of the A series ponds to Great Western Reservoir, and the release of Tritium, and volatile organics into the atmosphere from the evaporator distillate which has been added to the raw water system.

Section 3.0 Introduction page 3.1.
It is not necessary to include even a passing reference to the "no action" alternative since it is not fully analyzed in this section.

Section 3.1 Description of the Selected Remedy page 3-1.
The term "acceptance criteria" should have been defined. Other than Total Dissolved Solids (TDS), what are the other "re-use criteria" for the makeup water? This is important since, the "re-use criteria" are not stated anywhere else in the document.

Section 3.1.1 Treatment System Components page 3-2.
It is not completely clear that the "system" consists of three multiple-effect multiple-stage flash evaporators (MEMS), and that each MEMS has its own vapor compressor. At the bottom of the page "Main Floor Building 910 Process Room second sentence states "a vapor compressor and three evaporators". Should this read three vapor compressors and three evaporators....

Lower Level Building 910 page 3-4.
The second to the last sentence in the paragraph would be more informative if changed to read " The secondary containment volume provided by the sealed floor and sump will be at a minimum as large as the volume of the largest tank as required by 6 CCR 1007-3, Part 264 Subpart J for Hazardous Waste Tanks.

Flow Level and Spill Control page 3-9.
If the distillate contains hazardous waste, i.e.organics and radionuclides the distillate tank must also have secondary containment. If it can be demonstrated that the distillate in the 500,000 gallon tank does not contain hazardous waste before it is placed in the 500,000 gallon tank then the tank need not conform to the regulatory requirement for secondary containment.

Process Sampling Plan page 3-11.
This is the most deficient portion of the document and must be corrected before the "Division" will approve this IM/IRA. The "analysis plan" submitted to EPA and CDH must contain a list of all chemical constituents and parameters which will be measured and the corresponding "re-use criteria" or ARAR's which will determine whether or not the distillate will be reprocessed or released into the raw water system.

3.1.2.2 Equipment Description page 3-15.
The thickness of the HDPE should be substituted for the word "liner". The term "HDPE liner" is easily associated with plastic trash bags.

It was agreed at several meetings by EPA, DOE and CDH that in order to meet the regulatory definition for double-walled tanks that the floor of the tank must be constructed of primarily "non-earthen materials" which meant that the concrete around the leak detection sump must be extended beyond the wall of the tank and not just a donut of concrete filled with earth in the middle. DOE had not determined if this material would be asphalt or concrete.

3.1.3.6 Assumptions, Uncertainties and Contingencies page 3-19.
Six specific parameters for gross alpha, gross beta, plutonium, americium, tritium and uranium must be tested in each batch of distillate. It is likely that some other "treatment unit" will be called for to remove volatile organics from the distillate.

3.2.5 Short-term Effectiveness page 3-26.
Either the title or the contents of this section are erroneous. The generic risk assessment of the remedy in this section has nothing to do with the "effectiveness" of the project.